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U.S. DISTRICT JUDGE
S.D.N.Y.

Member New York State Bar

Admitted, SDNY, EDNY, Dist. of Conn.
Court of Appeals, Second Circuit

May 28, 2008

BY FAX (212-805-7901)

The Hon. Harold Baer, Jr.
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007-1312

**Re: Bejjani et al v. Manhattan Sheraton Corporation et al
Docket No. 07 Civ. 10729 (HB) (DCF)**

Dear Judge Baer:

I am the attorney for plaintiffs in the above civil action, which, pursuant to § 301 of the Labor Management Relations Act, 29 U.S.C. § 185, alleges violations of the collective bargaining agreement between defendant Manhattan Sheraton Corporation ("the Employer") and defendant New York Hotel and Motel Trade Council, AFL-CIO (the "Union") and alleges breaches by the Union of the duty of fair representation. ("DFR")

Both Defendants have separately moved to dismiss the complaint. The Union's Memo of Law is 25 pages and the Employer's is 24 pages. They cite collectively over 70 separate cases. Request is hereby made that the page limitations for my responsive brief be extended to 45 pages so that I may appropriately respond to their extensive filings.

In addition, after further consultation with my clients, we request that you make a referral to a Magistrate Judge, for settlement negotiations.

Respectfully yours,

Robert N. Felix
Robert N. Felix, Esq.

- c. Michael Starr, Esq.
Hogan & Hartson LLP via facsimile
Bruce Cooper, Esq.
Pitta & Dreier LLP via facsimile

5/29/08
① 4:00 PM on the 25th
for O/A
② I will reply the matter for
settlement conference
③ I can get papers fully
input to me at 6:30 AM is a draft
I will be able to read them before
the argument
cc'd Baer
USDC

Endorsement:

1. 4:00 P.M. on the 25th for oral argument.
2. I will refer the matter for settlement conference.
3. If you can get papers (fully briefed) to me on 6/20 there is a chance I'll be able to read them before the argument.